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VIA ECF

The Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: *Chevron Corp. v. Donziger*, 11 Civ. 0691 (LAK) (S.D.N.Y.)

Dear Judge Kaplan:

On August 2, 2019, the Court issued an order to Chevron Corporation (“Chevron”) to “file proper proof of service” of Chevron’s third motion to compel discovery responses from non-party Ms. Laura Miller. Dkt. 2282. I write as Chevron’s counsel to apprise Your Honor that Chevron filed with the Court on Friday an Affidavit of Service showing that Chevron caused a process agent to serve Ms. Miller by “delivering a true copy [of Chevron’s motion] to said witness personally” on July 24. Dkt. 2284. Under Federal Rule of Civil Procedure 5(b)(2)(A), “handing [a motion] to [a] person” is sufficient to effect service of the motion on that person. On August 1, 2019, Ms. Miller effectively confirmed she received service: she contacted Chevron’s counsel to request that Chevron provide her a second copy of the motion because she misplaced it. *See* Ex. 1. As a courtesy to Ms. Miller, on August 2, Chevron sent her a second copy by Federal Express next-day delivery. Chevron also confirmed in a response email to Ms. Miller that her filing deadline had passed on July 26. *Id.* As always, we appreciate the Court’s consideration.

Respectfully,

/s/ Randy M. Mastro
Randy M. Mastro

Attachment